

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION

IN RE: § CASE NO. 21-90242

BRADLEY COY SMITH
12526 N. FM 95
NACOGDOCHES, TX 75961
xxx-xx-9750

§ CHAPTER 13

DEBTOR §

MOTION FOR EXTENSION OF DEADLINES

Your rights may be affected by the relief sought in this pleading. You should read this pleading carefully and discuss it with your attorney, if you have one in this bankruptcy case. If you oppose the relief sought by this pleading, you must file a written objection, explaining the factual and/or legal basis for opposing relief.

No hearing will be conducted on this application unless a written objection is filed with the Clerk of the United States Bankruptcy Court and served upon the party filing this pleading WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE shown in the certificate of service unless the court shortens or extends the time for filing such objection. If no objection is timely served and filed, this pleading shall be deemed to be unopposed, and the Court may enter an order granting the relief sought. If an objection is filed and served in a timely manner, the Court will thereafter set a hearing with appropriate notice. If you fail to appear at the hearing, your objection may be stricken. The Court reserves the right to set a hearing on any matter.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

- 1) COMMERCIAL BANK OF TEXAS, N.A., (“Creditor”), a creditor in the above-referenced bankruptcy proceeding, requests that the court extend the deadline for filing of complaints to determine the dischargeability of debts pursuant to FRBP 4007(c) pursuant to FRBP 9006(1);

- 2) Cause exists for the extension of such deadlines because the Creditor is still investigating the loans/matter, location and status of Collateral, possible missing collateral, etc, that will/may give rise to the filing dischargability complaint.
- 3) The Attorney for the Debtor has informed the undersigned attorney for Creditor that the extension is not opposed by the Debtor.
- 4) Creditor hereby jointly request that these deadlines be extended for just over sixty [60] days and the requests the Court extend the deadlines until June 9, 2022.

Respectfully submitted this 4th day of April, 2022.

OFFERMAN & KING, L.L.P.

BY: /s/ James W. King

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ATTORNEY IN CHARGE FOR CREDITOR

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been forwarded to the following parties by electronic means or by first-class mail:

Attorney for Debtor:
Walter David Stephens
P.O. Box 444
Lufkin, TX 75902

Chapter 13 Trustee:
Lloyd Kraus
110 N. College, 12th Floor
Tyler, TX 75702

Debtor:
Bradley Coy Smith
12526 N. FM 95
Nacogdoches, TX 75961

And to all parties on the attached service list

This service complies with Local Rule of Bankruptcy Procedure 9013(f) and has been accomplished.

SIGNED AND DONE on this 4th day of April, 2022.

/s/ James W. King
James W. King